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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BRIAN BORENSTEIN,

Plaintiff,

v.

THE ANIMAL FOUNDATION, et al.,

Defendants.

Case No.: 2:19-cv-00985-APG-DJA

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
DEFENDANTS THE ANIMAL
FOUNDATION & CARLY SCHOLTEN
TO REPLY TO PLAINTIFF'S SECOND
AMENDED COMPLAINT [ECF NO. 189]**

[FIRST REQUEST]

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff, BRIAN BORENSTEIN, and Defendant, CARLY SCHOLTEN, by and through their undersigned counsel, that Defendants The Animal Foundation ("TAF") and Ms. Carly Scholten (collectively with TAF the "TAF Defendants") may have additional time within which to respond to Plaintiff's Second Amended Complaint [ECF No. 189].

Plaintiff's Second Amended Complaint was filed on August 23, 2021. Defense counsel has requested an additional week to prepare a response, to which counsel for Plaintiff's has graciously agreed. Therefore, the parties hereby stipulate that the last day for TAF Defendants to respond to Plaintiff's Second Amended Complaint is extended from Tuesday, September 7, 2021 to **Tuesday, September 14, 2021.**

Further, in light of travel plans and other obligations of Plaintiff's counsel, the Parties stipulate and request that Plaintiff's deadline to file a reply thereto be extended for a week from Tuesday, September 28, 2021 to **Tuesday, October 5, 2021.**

This request is made in good faith and not for the purpose of undue delay. This document is being electronically filed through the Court's CM/ECF System. Accordingly, counsel for Defendants hereby attests that (1) the content of this document is acceptable to all persons required to sign the document; (2) Plaintiff's counsel has concurred with the filing of this document and has authorized defense counsel to affix his electronic signature hereto; and (3) a record supporting this concurrence could be made available if so ordered by this Court.

Dated this 7th day of September, 2021.

Respectfully submitted,

REID RUBINSTEIN & BOGATZ

THE PALMER LAW FIRM, P.C.

By: /s/ Kerry E. Kleiman

By: /s/ Raelene K. Palmer

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ORDER

IT IS SO ORDERED.

DATED this 8th day of September 2021.



Daniel J. Albregts
United States Magistrate Judge

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